

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEBRASKA

UNITED STATES

CASE NO. 09-CR-457

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MOTION TO PRODUCE
UNDER RULE 16

SHANNON WILLIAMS

NOW COMES SHANNON WILLIAMS, PRO-SE, AND MOVES THE COURT TO ORDER THE GOVERNMENT TO TURN OVER TO THE DEFENSE THE CHAIN-OF-CUSTODY DOCUMENTS FOR THE 4-1-09 CONWAY-WILLIAMS TAPE. THERE WAS AMBLE TESTIMONY THAT THIS TAPE WAS OUTSIDE THE CUSTODY & CONTROL OF ALL GOVERNMENT AGENTS AND PAID GOVERNMENT AGENT HADDOCK AN INFORMANT ALSO FOR CONWAY'S RELEASE POSSESSED THE RECORDING DEVICE. AT A MINIMUM THE GOVERNMENT IN LIGHT OF THEIR OWN ADMITTANCES SHOW BY DOCUMENTARY EVIDENCE THE RELIABILITY OF THIS VERY IMPORTANT PIECE OF EVIDENCE. THE GOVERNMENT DOES NOT WANT TO SHOW ANYTHING TO PROVE THE TAPE WAS NOT POSSESSED IN BAD FAITH BY HADDOCK. NOTHING BUT SELF-SERVING TESTIMONY 20 MONTHS AFTER THE RECORDING WAS MADE. U.S. V CANON 88F3d1495 (8th)

The defendant also moves the court

to ORDER the GOVERNMENT to TURN OVER to the defense the documents of when the 10-29-08 AND 12-5-08 WHITNER-CONWAY-Williams WIRING of the ATTORNEY-CLIENT ROOMS WAS BOOKED INTO EVIDENCE, & WHEN WERE & the now AS to the 10-29-08 TAPE RECORDING. THESE ITEMS WERE PRODUCED IN DISCOVERY AS EVIDENCE TO PROSECUTE the DEFENDANT WITH. ONCE the DEFENSE through due-diligence UNDERMINED the CREDIBILITY & INTEGRITY of these TAPES the GOVERNMENT WANTS the JURY TO HAVE NO PART SEEING OR HEARING testimony of this FRAUDULENT EVIDENCE.

The DEFENDANT moves the court to produce the PHONE NUMBERS & SUBSCRIBER INFORMATION for CELL-PHONE USED to produce the 75 Haddock-Williams TAPES, made from 4-22-09 through 12-17-09.

These ARE ALL REASONABLE REQUEST of EVIDENCE for the powerful GOVERNMENT to produce.

The DEFENDANT prays that the court ORDER the GOVERNMENT to produce the documents. UNDER rule 16
Respectfully Submitted this 3rd day OF March 2011

Sham Will

This motion was electronically filed & AUSA LEHE NOTIFIED.